AMENDMENTS TO THE DRAWINGS:

The attached sheets of drawings include changes to Figures 3-5. These sheets, which include Figures 3-5, replace the original sheets including Figures 3-5. Applicants submit that no new matter has been added based on the deletion.

Attachments: Replacement Sheets
Annotated Sheets Showing Changes

REMARKS

Claims 1-45 are pending in this application. In an Office Action mailed July 10, 2007 ("OA"), the Examiner rejected claims 1-45. With this response, Applicants amend claims 1, 9-12, 16, 24-27, 31, and 39-42, and add new claims 46-48. Applicants respectfully traverse the rejections and request reconsideration based on the following remarks.

In addition, Applicants do not necessarily agree with or acquiesce to the Examiner's characterization of the claims or the prior art, even if those characterizations are not addressed herein.

Examiner Interview dated August 21, 2007

Applicants thank the Examiner for conducting the Examiner Interview dated August 21, 2007.

Drawings

The Examiner objected to Figures 3-5 because they allegedly are prior art. The Examiner stated:

> Figures 3-5 show computer systems and their components, which *may* be used to execute [Applicants'] system. However, the figures do not include structures that directly map to any aspect of Applicant's claimed system. Thus, they only show 'a general computer, general components of a computer, and a general computer system.'

OA at page 2.

To further prosecution, Applicants amend Figures 3-5 to illustrate that a *general* computer, *general* components of a computer, and a *general* computer system are prior

art. Accordingly, Applicants respectfully request that the Examiner withdraw the objection to the drawings.

Claim Rejections - 35 U.S.C. § 103

The Examiner rejected claims 1-45 under 35 U.S.C. § 103(a) as being over "The Java Virtual Machine Specification" ("Lindholm") in view of U.S. Publication No. 2002/0049603 ("Mehra"). Applicants further address new claims 46-48 within this section because they recite subject matter that was previously presented in independent claims 1, 16, and 31. Applicants respectfully traverse the rejection.

Amended claim 1 recites "[a] method for processing data in an automatic data processing system, comprising: creating an application using a non-object-oriented development language by: defining one or more classes of objects …; creating one or more objects of the one or more classes …; creating a tool …; and assigning the tool to one of the one or more objects of the one or more classes by using the identifier of the object" (emphasis added). To establish a prima facie case of obviousness, the MPEP and case law require that (1) the prior art reference must teach or suggest all claimed elements, (2) there must be some reason why a person of ordinary skill in the art would have combined the prior art elements in the manner claimed, and (3) there must be a reasonable expectation of success. *See MPEP § 2142* and *USPTO Memorandum* from Margaret A. Focarino, Deputy Commissioner for Patent Operations, May 3, 2007, page 2. Applicants respectfully submit that the cited prior art fails to disclose or suggest this combination of elements.

Lindholm is directed to describing the Java programming language. But Java is an object oriented software language. Contrary to claim 1, which recites "creating an

application using a <u>non-object-oriented development language</u>." Because Lindholm only describes using an objected oriented programming language, Lindholm fails to disclose or suggest "[a] method for processing data in an automatic data processing system, comprising: creating an application using a non-object-oriented development language by: defining one or more classes of objects …; creating one or more objects of the one or more classes …; creating a tool …; and assigning the tool to one of the one or more objects of the one or more classes by using the identifier of the object".

Further, Mehra fails to overcome these deficiencies of Lindholm. Mehra is directed to providing an improved architecture for an enterprise business application server. Mehra at page 1, paragraph 0008 (1:0008). But Mehra fails to disclose "defining one or more classes of objects …; creating one or more objects of the one or more classes …; creating a tool …; and assigning the tool to one of the one or more objects of the one or more classes by using the identifier of the object" using a non-object-oriented development language, as recited in amended claim 1. Accordingly, because Lindholm in view of Mehra fails to disclose or suggest this feature, Applicants respectfully submit that claim 1 is patentable over these references.

Claims 2-15 and 46 depend on claim 1 and are patentable for at least the same reasons as claim 1.

Independent claims 16 and 31 recite language similar to that of claim 1. For at least these reasons, Applicants respectfully submit that claims 16 and 31 are patentable over the cited prior art.

Claims 17-30, 32-45, 47, and 48 depend on at least one of claims 16 and 31 and are patentable for at least the same reasons as claims 16 and 31.

Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: November 13, 2007   By:

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Attachments: Replacement Sheets
Annotated Sheets Showing Changes